

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

McRO, Inc. d.b.a. PLANET BLUE,

Plaintiff,

v.

BETHESDA SOFTWARES LLC,

Defendant.

Civil Action No. 12-1509 (LPS-CJB)

STIPULATION TO STAY AND [PROPOSED] ORDER

IT IS HEREBY STIPULATED by Plaintiff McRo, Inc. d.b.a. Planet Blue (“Planet Blue”) and Defendant Bethesda Softworks LLC (“Bethesda”), subject to the approval of the Court, that all deadlines are hereby stayed for a period of thirty (30) days. The parties hereby notify the Court that all matters related to the case involving Planet Blue and Bethesda have been resolved, in principle. The parties request that the Court stay all unreached case deadlines applicable between Planet Blue and Bethesda to allow for an agreement to be finalized and the appropriate dismissal papers to be submitted to dismiss all claims in this action. Resolution of this case leaves *McRo, Inc. d.b.a. Planet Blue v. Harmonix Music Systems, Inc.*, C.A. No. 12-1510 (LPS-CJB), as the only case pending before this Court involving the patents-in-suit.

Dated: June 6, 2017

FARNAN LLP

/s/ Michael J. Farnan

Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
919 North Market Street
12th Floor
Wilmington, DE 19801
(302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Attorneys for Plaintiff

Respectfully submitted,

DLA PIPER LLP

/s/ Denise Seastone Kraft

Denise Seastone Kraft (#2778)
Brian A. Biggs (#5591)
1201 N. Market Street
Suite 2100
Wilmington, DE 19801
302-468-5661
denise.kraft@dlapiper.com
brian.biggs@dlapiper.com

*Attorney for Defendant Bethesda Softworks
LLC*

IT IS SO ORDERED this _____ day of _____, 2017.

Honorable Christopher J. Burke
United States Magistrate Judge